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UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

NIPPON YUSEN KAISHA a.k.a. NYK LINE,
Plaintiff,
- against -
TJD INTERNATIONAL, INC.,
Defendant.

11-CV

COMPLAINT IN ADMIRALTY

Plaintiff, by its attorneys, Cichanowicz Callan Keane Vengrow & Textor, LLP, for its complaint, alleges:

COUNT 1

1. The jurisdiction of this Court is based upon:
 - (a) The admiralty and maritime nature of the claims within the meaning of 28 U.S.C. 1333(1) and F.R.Civ.P. 9(h); or
 - (b) Diversity of citizenship within the meaning of 28 U.S.C. 1332(a)(2); and
 - (c) Supplemental Jurisdiction within the meaning of 28 U.S.C. 1367.
2. Plaintiff is a corporation organized and existing under the laws of Japan. It carries on business as an ocean common carrier by sea in the international trade of the United States and is licensed by the Federal Maritime Commission.

3. On information and belief, defendant is a corporation organized and existing under the laws of New Jersey with its office and principal place of business at 150 River Road Bldg.G, Unit 4A Montville, N.J. 07045.

4. Defendant was the booking party, shipper, consignor and billing party of certain shipments carried by plaintiff by sea between the U.S. and various foreign ports pursuant to certain bill of lading or sea waybill contracts of carriage a breakdown of which is attached as SCHEDULE A.

5. Those contracts of carriage were performed by plaintiff and all amounts due plaintiff under those contracts of carriage have been earned.

6. Pursuant to said contracts of carriage, there is now due and owing to plaintiff, from the defendant, ocean freight and other charges in the aggregate principal amount of \$110,526.00 exclusive of interest and costs.

7. Plaintiff sues on theories of breach of contract and account stated.

8. All conditions precedent have been performed or have occurred.

WHEREFORE, Plaintiff prays:

(a) That plaintiff have judgment for the amount of its claim together with interest plus the costs and disbursements of this action. And,

(b) That plaintiff have whatever other relief it may be entitled to.

Dated: New York, NY, December 16, 2011

CICHANOWICZ, CALLAN, KEANE,
VENGROW & TEXTOR, LLP
Attorneys for Plaintiff

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SCHEDULE A

| A | B | C | D | E | F | G | H | I | J | K | L | M | N | O | P |
|----------------------------|---------|------------|------------|---------|------------|--------|--------------|------------|------------|---------------|------|---------------|-----------------------|----------|---------------------|
| Payor | Payee | Payee SAE | Invoice No | Inv. Ty | BL No | Bound | Invoice Date | Due Date | Invoice ID | Receivable | Paid | Balance | Days Sales | El Sales | Customer's Referral |
| T.J.D. International | 1018380 | 1018380000 | 0100018328 | SF | 6050123250 | Export | 10/31/2008 | 10/31/2008 | 1088 | \$ 700.00 | \$ - | \$ 700.00 | Days Constal New York | | INT.12841 |
| T.J.D. International | 1018380 | 1018380000 | 0100344464 | SF | 6060658100 | Export | 10/6/2009 | 10/10/2009 | 744 | \$ 15,028.40 | \$ - | \$ 15,028.40 | Days Constal New York | | INT.12910 |
| T.J.D. International | 1018380 | 1018380000 | 0100450751 | SF | 6050933560 | Export | 1/6/2010 | 1/28/2010 | 634 | \$ 2,965.00 | \$ - | \$ 2,965.00 | Days Constal New York | | INT.12910 |
| T.J.D. International | 1018380 | 1018380000 | 0100640177 | SF | 6061206760 | Export | 6/23/2010 | 7/11/2010 | 470 | \$ 2,067.00 | \$ - | \$ 2,067.00 | Days Constal New York | | INT.12910 |
| T.J.D. International, Inc. | 1018380 | 1018380000 | 0100672110 | SF | 6050150750 | Export | 7/20/2010 | 8/7/2010 | 443 | \$ 16,560.00 | \$ - | \$ 16,560.00 | Days Constal New York | | INT.12910 |
| T.J.D. International, Inc. | 1018380 | 1018380000 | 0100696413 | SF | 6051549360 | Export | 8/9/2010 | 8/28/2010 | 422 | \$ 22,080.00 | \$ - | \$ 22,080.00 | Days Constal New York | | INT.12910 |
| T.J.D. International, Inc. | 1018380 | 1018380000 | 0100756309 | SF | 6061018180 | Export | 9/24/2010 | 9/24/2010 | 395 | \$ 1,907.60 | \$ - | \$ 1,907.60 | Days Constal New York | | INT.13606 |
| T.J.D. International, Inc. | 1018380 | 1018380000 | 0100799067 | SF | 6051800170 | Export | 11/2/2010 | 11/20/2010 | 338 | \$ 2,128.75 | \$ - | \$ 2,128.75 | Days Constal New York | | INT.13673 |
| T.J.D. International, Inc. | 1018380 | 1018380000 | 0100842603 | SF | 6061695560 | Export | 12/10/2010 | 12/10/2010 | 318 | \$ 2,057.60 | \$ - | \$ 2,057.60 | Days Constal New York | | INT.13673 |
| T.J.D. International, Inc. | 1018380 | 1018380000 | 0100824629 | SF | 6051837280 | Export | 11/23/2010 | 12/13/2010 | 315 | \$ 2,128.75 | \$ - | \$ 2,128.75 | Days Constal New York | | INT.13674 |
| T.J.D. International, Inc. | 1018380 | 1018380000 | 0100824631 | SF | 6061531620 | Export | 11/23/2010 | 12/13/2010 | 315 | \$ 3,350.00 | \$ - | \$ 3,350.00 | Days Constal New York | | INT.13685 |
| T.J.D. International, Inc. | 1018380 | 1018380000 | 0100847859 | SF | 6051919180 | Export | 12/15/2010 | 1/4/2011 | 293 | \$ 2,128.75 | \$ - | \$ 2,128.75 | Days Constal New York | | INT.13685 |
| T.J.D. International, Inc. | 1018380 | 1018380000 | 0100864959 | SF | 6061672860 | Export | 1/3/2011 | 1/20/2011 | 277 | \$ 2,550.00 | \$ - | \$ 2,550.00 | Days Constal New York | | INT.13686 |
| T.J.D. International, Inc. | 1018380 | 1018380000 | 0100873663 | SF | 6051919180 | Export | 1/26/2011 | 2/15/2011 | 267 | \$ 2,171.75 | \$ - | \$ 2,171.75 | Days Constal New York | | INT.13875 |
| T.J.D. International, Inc. | 1018380 | 1018380000 | 0100891263 | SF | 6061732010 | Export | 2/8/2011 | 2/28/2011 | 251 | \$ 2,253.75 | \$ - | \$ 2,253.75 | Days Constal New York | | INT.13875 |
| T.J.D. International, Inc. | 1018380 | 1018380000 | 0100906261 | SF | 6061732000 | Export | 2/8/2011 | 2/28/2011 | 238 | \$ 2,253.75 | \$ - | \$ 2,253.75 | Days Constal New York | | INT.13875 |
| T.J.D. International, Inc. | 1018380 | 1018380000 | 0100913107 | SF | 6052045210 | Export | 2/15/2011 | 3/7/2011 | 231 | \$ 2,253.75 | \$ - | \$ 2,253.75 | Days Constal New York | | INT.13875 |
| T.J.D. International, Inc. | 1018380 | 1018380000 | 0100920684 | SF | 6052045210 | Export | 2/23/2011 | 3/15/2011 | 223 | \$ 2,171.75 | \$ - | \$ 2,171.75 | Days Constal New York | | INT.13875 |
| T.J.D. International, Inc. | 1018380 | 1018380000 | 0100926018 | SF | 6061823890 | Export | 3/1/2011 | 3/21/2011 | 217 | \$ 2,171.75 | \$ - | \$ 2,171.75 | Days Constal New York | | INT.13875 |
| T.J.D. International, Inc. | 1018380 | 1018380000 | 0100940342 | SF | 6061823880 | Export | 3/14/2011 | 4/3/2011 | 204 | \$ 2,253.75 | \$ - | \$ 2,253.75 | Days Constal New York | | INT.13884 |
| T.J.D. International, Inc. | 1018380 | 1018380000 | 0100958248 | SF | 6052161560 | Export | 3/29/2011 | 4/18/2011 | 189 | \$ 2,171.75 | \$ - | \$ 2,171.75 | Days Constal New York | | INT.13955 |
| T.J.D. International, Inc. | 1018380 | 1018380000 | 0100973803 | SF | 6052165240 | Export | 4/12/2011 | 5/2/2011 | 175 | \$ 2,343.75 | \$ - | \$ 2,343.75 | Days Constal New York | | INT.13955 |
| T.J.D. International, Inc. | 1018380 | 1018380000 | 0100987561 | SF | 6061657330 | Export | 4/26/2011 | 5/15/2011 | 162 | \$ 2,425.75 | \$ - | \$ 2,425.75 | Days Constal New York | | INT.14004 |
| T.J.D. International, Inc. | 1018380 | 1018380000 | 0101004059 | SF | 6061657320 | Export | 5/12/2011 | 5/30/2011 | 147 | \$ 2,383.75 | \$ - | \$ 2,383.75 | Days Constal New York | | INT.14005 |
| T.J.D. International, Inc. | 1018380 | 1018380000 | 0101017528 | SF | 6052212730 | Export | 6/1/2011 | 6/21/2011 | 133 | \$ 2,383.75 | \$ - | \$ 2,383.75 | Days Constal New York | | INT.14063 |
| T.J.D. International, Inc. | 1018380 | 1018380000 | 0101025556 | SF | 6052212740 | Export | 6/1/2011 | 6/21/2011 | 125 | \$ 2,383.75 | \$ - | \$ 2,383.75 | Days Constal New York | | INT.14063 |
| T.J.D. International, Inc. | 1018380 | 1018380000 | 0101040419 | SF | 6052327680 | Export | 6/14/2011 | 7/4/2011 | 112 | \$ 2,425.75 | \$ - | \$ 2,425.75 | Days Constal New York | | INT.14099 |
| T.J.D. International, Inc. | 1018380 | 1018380000 | 0101046072 | SF | 6052327670 | Export | 6/20/2011 | 7/10/2011 | 106 | \$ 2,425.75 | \$ - | \$ 2,425.75 | Days Constal New York | | INT.14100 |
| Total | | | | | | | | | | \$ 110,526.10 | \$ - | \$ 110,526.10 | | | 28 |